

Appl. No. 09/728,418
Amtd. Dated June 9, 2004
Reply to Office action of March 22, 2004

REMARKS

Claims 1-36 are pending in the present application.

This is in response to the Office Action mailed March 22, 2004. In the Office Action, the Examiner rejected claims 1-36 under 35 U.S.C. §102(e). Reconsideration in light of the remarks made herein is respectfully requested.

Rejection Under 35 U.S.C. § 102

1. In the Office Action, the Examiner rejected claims 1-36 under 35 U.S.C. §102(e) as being anticipated by U.S. Patent No. 6,581,108 issued to Denison et al. ("Denison"). Applicants respectfully traverse the rejection and contend that the Examiner has not met the burden of establishing a prima facie case of anticipation. As the Examiner may be aware, to anticipate a claim, the reference must teach every element of the claim. "A claim is anticipated only if each and every element as set forth in the claim is found, either expressly or inherently described, in a single prior art reference." Vergegaal Bros. v. Union Oil Co. of California, 814 F.2d 628, 631, 2 USPQ 2d 1051, 1053 (Fed. Cir. 1987). "The identical invention must be shown in as complete detail as is contained in the...claim." Richardson v. Suzuki Motor Co., 868 F.2d 1226, 1236, 9 USPQ 2d 1913, 1920 (Fed. Cir. 1989).

Denison discloses managing multiple private data networks using network and payload address translation. A router scans all incoming packets. It forwards a packet to a Management Payload Address Translator (MPAT) located externally to the router (Denison, col. 3, lines 3-6; Figure 1) if the packet is determined to be an SNMP packet (Denison, col. 3, lines 17-26). The MPAT next scans all relevant data in a given redirected SNMP, parses the ASN.1 encoding used by the SNMP, and detects data that is an IP address (Denison, col. 3, lines 33-37). The parsing process checks to see if the data corresponds to an IP address, an object identifier (OID), or a sequence (Denison, col. 4, lines 10-13; lines 52-54).

Denison does not disclose, either expressly or inherently, (1) a table to store entries obtained from a description file, and (2) a parser to parse the packet using the table, as recited in claims 1, 13, 25, and 31. As discussed above, Denison merely discloses the router scanning the packets by the router and the MPAT scanning the redirected packet. The MPAT scans the redirected packet to determine if the data is an IP address, an OID, or a sequence. The parsing is

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performed on the re-directed packet without the use of a table of entries. Furthermore, this process does not involve obtaining the entries from a description file of the packet.

Therefore, Applicants believe that independent claims 1, 13, 25, 31 and their respective dependent claims are distinguishable over the cited prior art references. Accordingly, Applicants respectfully request the rejection under 35 U.S.C. §102(e) be withdrawn.

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Conclusion

Applicants respectfully request that a timely Notice of Allowance be issued in this case.

Respectfully submitted,

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Tu Nguyen

June 9, 2004

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